

US EPA ARCHIVE DOCUMENT

# Docu-Proof

## PPDC PRIA Process Improvement WG

April 19, 2011

Arlington, VA

**Doug Soper**

# Principal Proofreading Situations

## 20 Label Types

- Proto Label Language
- **Proposed Master Label (clean & highlighted)**
- **Stamped Accepted Master Label**
- **Full Accepted Master Label**
- Commercial Label Text
- **Typeset Container Label Components**
- Printing Plates
- Printed Container Label Components
- Fully Assembled Container Label
- **State Registration Label (clean & highlighted)**
- Final Printed Label
- **Specimen Label**
- **Third-Party Label Vendors(4 types)**
- State "Labels" (24(c), Sec 18, 2(ee), Supplemental

## Electronic File Type

- Email
- **Microsoft Word and other wordprocessing**
- **TIFF**
- **Desktop Publishing (e.g., QuarkXpress, Adobe In-Design, Adobe Illustrator)**
- **PDF (scanned and text)**
- Structured (XML, other database)

# Principal Proofreaders and Methods

## Proofreaders

- **Registrant Regulatory Label Specialist**
- Registrant Commercial Label Specialist
- Registrant Federal Regulatory Manager
- Registrant State Regulatory Specialist
- **EPA Product Manager**
- **Typesetter**
- **Regulators in 50 States**
- Plate Maker
- Printer
- Third-Party Label Vendors

## Methods

- **Eyeballs**
- Electronic tools (e.g., Adobe Acrobat, Microsoft Word Compare, Workshare Compare, pdfDocs compareDocs, **DocuProof**)

# Scope (1 organization!)

PBI/Gordon has about **240 federal registrations**. Label length averages 10 pages. Altogether they contain about **1,000,000 words**.

PBI/Gordon commercializes about 175 of the 240 and an additional 25 master labels of other companies. About 800,000 words are repurposed onto **290** products in **450** SKUs. There are about **1100** container label components. Plus there are about **100** specimen labels.

Between the master, container, and specimen labels there are around **3,000,000 words in our proofreading universe**.

At 10 point type that's about **18 miles of text**.

# Before The Fancy Tools . . .

**Trusted workflows** govern who does what and how. When a label arrives for proofreading, the proofreader knows who has touched it and why.

The best proofreading is the proofreading already performed (preferably by **someone else!**).

Trusted workflows **leverage the collective efforts** of everyone involved in the creation and review of labels.

Requires a **common understanding** of the overall process.

Status tracking, version control, transparency are key.

# Docu-Proof

Global Vision, Inc., Montreal, Canada,  
<http://www.globalvisioninc.com/>

**Text Inspection** (in contrast to Graphic Inspection or  
Hardcopy Inspection)

Word-to-Word, **Word-to-PDF, PDF-to-PDF**, and others

Docu-Proof Enterprise

File Tools View Report Help

Original

Revision

Albaugh Word file.doc

42750-61 existing name.pdf

AP063010

**Glyphosate 41% Plus**

AVOID CONTACT OF HERBICIDE WITH FOLIAGE, GREEN STEMS, EXPOSED NON-WOODY ROOTS OR FRUIT OF CROPS, DESIRABLE PLANTS AND TREES, BECAUSE SEVERE INJURY OR DESTRUCTION MAY RESULT.

Read the "LIMITED WARRANTY AND DISCLAIMER" statement at the end of the label before buying or using this product. If terms are not acceptable, return at once unopened.

ACTIVE INGREDIENT:  
\*Glyphosate, N-(phosphonomethyl)glycine, in the form of its isopropylamine salt ..... 41.0%  
OTHER INGREDIENTS: ..... 59.0%  
TOTAL 100.0%

\*Contains 480 grams per litre or 4 pounds per U.S. gallon of the active ingredient, glyphosate, in the form of its isopropylamine salt.

Equivalent to 356 grams per litre or 3 pounds per U.S. gallon of the acid, glyphosate.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

EPA Reg. No. 42750-61-2217  
NET CONTENTS: \_\_\_\_ Gallons

EPA Est. No.

Manufactured by:  
Albaugh, Inc.  
Ankeny, IA 50021

FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE, CALL CHEMTREC (800) 424-9300

1

PEEL HERE TO OPEN ▶

**Gordon's FARM**

**PRONTO**

**BIG N' TUF<sup>2</sup>**

**NONSELECTIVE AGRICULTURAL HERBICIDE**

**FOR BIG JOBS AND TOUGH WEEDS – EVEN KILLS THE ROOTS!**

**ACTIVE INGREDIENT:**  
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**CAUTION**

See inside pages for complete Precautionary Statements and Directions for Use (including First Aid, Agricultural Use Requirements and Storage and Disposal).

**FOR CHEMICAL SPILL, LEAK, FIRE, OR EXPOSURE, CALL CHEMTREC (800) 424-9300**

**NET CONTENTS: ONE U.S. GALLON**

0 70251 95678 4

956/8-2010 AP063010  
EPA REG. NO. 42750-61-2217  
EPA EST. NO. 2217-KS-2

**pbi/gordon corporation**  
An Employee-Owned Company

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Original Revision

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12.0 ROUNDUP READY CROPS
12.1 Roundup Ready Alfalfa
12.2 Roundup Ready Corn
12.3 Roundup Ready Soybeans
13.0 ANNUAL & PERENNIAL CROPS
13.1 Cereal & Grain Crops
13.2 Corn
13.3 Fallow Systems
13.4 Grain Sorghum (Milo)
13.5 Soybeans (Non-Roundup Ready)
13.6 Vegetable Crops
13.7 Miscellaneous Crops
STORAGE & DISPOSAL
WARRANTY STATEMENT

### PRECAUTIONARY STATEMENTS

#### Hazards to Humans and Domestic Animals

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

**DOMESTIC ANIMALS:** This product is considered to be relatively nontoxic to dogs and other domestic animals; however, ingestion of this product or large amounts of freshly sprayed vegetation may result in temporary gastrointestinal irritation (vomiting, diarrhea, colic, etc.). If such symptoms are observed, provide the animal with plenty of fluids to prevent dehydration. Call a veterinarian if symptoms persist for more than 24 hours.

#### Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

1. Long-sleeved shirt and long pants.
2. Shoes plus socks.

Follow manufacturer's instructions for cleaning/maintaining PPE (Personal Protective Equipment). If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems or enclosed cabs in a manner that meets the requirements listed in Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240 (d) (4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

#### User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

#### First Aid

**IF IN EYES:**

- Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

**HOT LINE NUMBER:** Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-800-5556 for emergency medical treatment information.

#### Environmental Hazards

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

#### Physical or Chemical Hazards

Spray solutions of this product should be mixed, stored and applied using only stainless steel, aluminum, fiberglass, plastic or plastic-lined steel containers.

DO NOT MIX, STORE OR APPLY THIS PRODUCT OR SPRAY SOLUTIONS OF THIS PRODUCT IN GALVANIZED STEEL OR UNLINED STEEL (EXCEPT STAINLESS STEEL) CONTAINERS OR SPRAY TANKS. This product or spray solutions of this product react with such containers and tanks to produce hydrogen gas which may form a highly combustible gas mixture. This gas mixture could flash or explode, causing serious personal injury, if ignited by open flame, spark, welder's torch, lighted cigarette or other ignition source.

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	TYPE	LEVEL	ORIGINAL	REVISION	COMMENT
1	Change				
2	Change				
3	Change				
4	Change				
5	Change	PBIG number		1-877-800-5556	

Original

Revision

Albaugh Word file.doc

42750-61 existing name.pdf

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STORAGE & DISPOSAL

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Results Summary

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- Sow your seeds before and after herbicide applications.
- Start with a clean field, use either a burndown herbicide application or tillage.
- Control weeds early when they are relatively small.
- Add other herbicides (e.g., a selective and/or a residual herbicide) and cultural practices (e.g. tillage or crop rotation) where appropriate.
- One method of adding other herbicides into a continuous Roundup Ready system is to rotate to other Roundup Ready crops.
- Use a label rate for the most difficult to control weed in your field. Avoid tank mixtures with other herbicides that reduce this product's efficacy (through antagonism), or tank mixture recommendations that encourage application rates of this product below the label recommendations.
- Control weed escapes and prevent weeds from setting seeds.
- Use a resistant herbicide or a pre-emergent herbicide to reduce the spread of weeds seed or plant parts.
- Use new commercial seed that is as free of weed seed as possible.




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6 of 70






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6 of 70



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File Tools View Report Help

53

Insertion

54

Insertion

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Insertion

56

Insertion

57

Insertion

58

Deletion

TYPE

LEVEL

ORIGINAL

REVISION

COMMENT

9.5

Utility Sites (cont.)

TYPES OF APPLICATIONS

USE DIRECTIONS PRECAUTIONS, RESTRICTIONS

Boom Sprayers, Shielded Boom Sprayers, High-Volume Off-Center 1Tank

Original

Revision

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9.0 Industrial and Turf & Ornamental

9.1 Noncrop Areas & Industrial Sites

LABELLED USER: Non-crop areas including airports, apartment complexes, Christmas tree farms, commercial sites, Conservation Reserve Program (CRP) areas, ditch banks, dry canals, fence rows, golf courses, greenhouses, industrial sites, landscape areas, lumber yards, manufacturing sites, municipal sites, national areas, office complexes, ornamentals, parks, parking areas, pastures, petroleum tank farms and pumping installations, plant nurseries, public areas, railroads, recreational areas, residential areas, rights-of-way, roadsides, schools, sod or turf seed farms, sports complexes, storage areas, substations, turfgrass areas, utility sites, warehouse areas, and wildlife management areas.

TYPES OF APPLICATIONS

USE DIRECTIONS

This product may be used to trim-end-edge around objects in non-crop sites, for spot treatment of unwanted vegetation and to eliminate unwanted weeds growing in established shrub beds or ornamental plantings. This product may be used prior to planting an area to ornamentals, flowers, turfgrass (sod or seed), or prior to laying asphalt or beginning construction projects.

Make applications according to the rates listed in ANNUAL WEEDS, PERENNIAL WEEDS, and WOODY BRUSH & TREES RATE TABLES in this label.

Repeated applications of this product may be used, as weeds emerge, to maintain bare ground.

TANK MIXTURES: This product may be tank mixed with the following products (or generic equivalents) provided that the specific product is registered for use on the target site. Refer to these product labels for approved sites and application rates. Read and carefully observe the cautionary statements and all other information appearing on the labels of all herbicides used. Use according to the most restrictive precautionary statements for each product in the mixture.

User is responsible for ensuring that the mixture product's label allows the specific applications.

2,4-D Arsenal(TM) Atrazine Barricade(TM) 65WG Certainty Crossbow L Dicamba\* Diuron Endurance(TM) Escort(TM) Escort XP

Gallery TEP Gardon(TM) 3A Galari 4 Goal 2XL Krovar(TM) I DF Landmark II NP Landmark II Out Out XP Outstar Pendimethalin

Plateau(TM) Poast Runtan(TM) 50 WP Simazine Surflan(TM) AS Surflan WDG Telar DF Transline Vanquish Velpar DF Velpar L

When applied as a tank mixture for bare ground, this product provides control of the emerged annual weeds and control of partial control of emerged perennial weeds, woody brush and trees.

For control or partial control of the following perennial weeds, apply 1 to 2 quarts of this product plus 2 to 4 ounces of Quat or Quat XP per acre.

Bahia grass Bermudagrass Bromesgrass Dallisgrass

Dock, curly Dogfennel Fescue, tall Johnson grass

Poa annua Quackgrass Vioygrass Vervain, blue

28

9.5 Utility Sites (cont.)

TYPES OF APPLICATIONS

USE DIRECTIONS

PRECAUTIONS, RESTRICTIONS

Boom Sprayers, Shielded Boom Sprayers, High-Volume Off-Center Nozzles, Hand-Held Equipment, And Similar Equipment.

2,4-D<sup>2</sup> Arsenal Atrazine<sup>1</sup> Barricade 65WG Dicamba<sup>1</sup> Diuron<sup>1</sup> Endurance Escort Escort XP Garlon 3A<sup>2</sup>

Garlon 4<sup>3</sup> Krenite Krovar 1 DF Out Out XP Outstar Pendimethalin<sup>1</sup> Escort Princep Ronstar 50WP

Sahara Simazine<sup>1</sup> Surflan AS Surflan WDG Telar DF Transline Vanquish Velpar DF Velpar L

Observe application precautions in APPLICATION EQUIPMENT & TECHNIQUES.

Avoid application to non-target plants due to drift, overspray or runoff.

<sup>1</sup>Tank mixtures with product containing this generic active ingredient may be made provided the specific product is registered for the use.

<sup>2</sup>Ensure that Garlon 3A is thoroughly mixed with water according to label directions before adding this product. Have spray mixture agitating at the time this product is added to avoid spray incompatibility problems.

<sup>3</sup>For side trimming treatments, it is recommended that this product be used alone or in a tank mixture with Garlon 4.

10.0 Pasture Grasses, Forage Grasses, Forage Legumes & Rangelands

10.1 Alfalfa, Clover, & Other Forage Legumes

LABELLED CROPS: Alfalfa, Clover, Kenaf, Kudzu, Lespedeza, Leucaena, Lupin, Sainfoin, Trefoil, Velvet bean, Vetch (all types)

TYPES OF APPLICATIONS

USE DIRECTIONS

PRECAUTIONS, RESTRICTIONS

Pre-plant, Pre-emergence, At-Planting

This product may be applied before, during or after planting crops listed.

Make applications according to the rates listed in ANNUAL WEEDS, PERENNIAL WEEDS, and WOODY BRUSH & TREES RATE TABLES in this label.

Applications must be made prior to emergence of the crop.

If a single application is made at rates of 2 quarts per acre or less, no waiting period between treatment and feeding or grazing is required.

If application rates greater than 2 quarts per acre are made, remove domestic livestock before application and wait 8 weeks after application before grazing or harvesting.

*(cont. on next page)*

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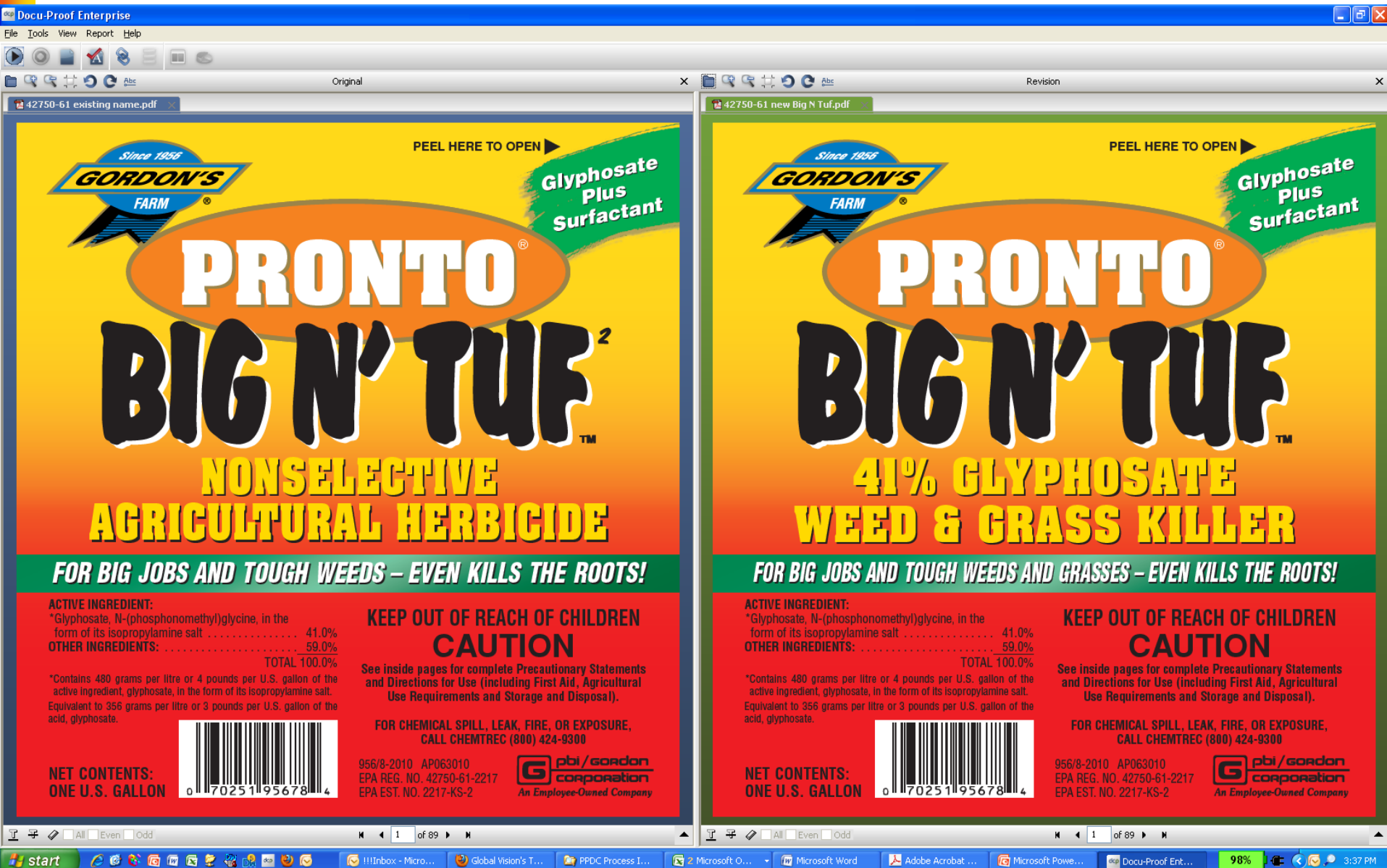
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File Tools View Report Help

	TYPE	LEVEL	ORIGINAL	REVISION	COMMENT
1	Change		NONSELECTIVE AGRICULTURAL HERBICIDE	41% GLYPHOSATE WEED & GRASS KILLER	
2	Change		FOR BIG JOBS	FFOR BIIG JJOBBSS	
3	Change		TOUGH WEEDS – EVEN KILLS THE ROOTS!	TTOUGH WEEEDDSS AND GRASSSSSEESS — EEEVEN KIIILLSS TTREE ROOTTSS!!	
4	Change		Tuf2™	Tuf™	
5	Change		Tuf2™	Tuf™	
6	Change		Tuf2™.	Tuf™.	

Original	N	O	N	S	E	L	E	C	T	I	V	E		A	G	R	I	C	U	L	T	U	R	A	L		H	E	R	B	I	C	I	D	E		
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42750-61 existing name.pdf

Original

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Revision

Since 1958

GORDON'S

FARM

PEEL HERE TO OPEN

Glyphosate Plus Surfactant

PRONTO

BIG N' TUF

NONSELECTIVE AGRICULTURAL HERBICIDE

FOR BIG JOBS AND TOUGH WEEDS – EVEN KILLS THE ROOTS!

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CAUTION

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956/8-2010 AP063010  
EPA REG. NO. 42750-61-2217  
EPA EST. NO. 2217-KS-2

gordon corporation  
An Employee-Owned Company

NET CONTENTS:  
ONE U.S. GALLON

Since 1958

GORDON'S

FARM

PEEL HERE TO OPEN

Glyphosate Plus Surfactant

PRONTO

BIG N' TUF

41% GLYPHOSATE WEED & GRASS KILLER

FOR BIG JOBS AND TOUGH WEEDS AND GRASSES – EVEN KILLS THE ROOTS!

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gordon corporation  
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NET CONTENTS:  
ONE U.S. GALLON

Results Summary

Set (of 1) 1

☒ Change

10

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1

Total: 10 (of 11) Duration: 0:00:09

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Inbox - Micro...

Global Vision's T...

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# What We Like

It fit into **existing processes.**

Differences between documents are **displayed clearly.**

**Selecting chunks** of text to compare.

User settings are not complex. (Others disagree)

**Supplemental Distributor Labels**

**Relative** to other tools: Adobe Acrobat, Word, Workshare Compare, pdfDocs compareDocs

# What We Don't Like

I find myself proofing in more detail than I would have in the past. **It's a trap.** If it doesn't need proofing, don't proof it.



# Summary

Proofing is an awful job that no one wants to do. It requires **sharp people who are willing to do a dull job.**

Trusted "primary" proofing = **quality improvement.**  
"Secondary" proofing eliminated = **savings.**

Higher quality **tightens-up** all the other processes. No one notices when a Purchasing Agent asks for label approval a day or a week earlier because of some problem last time. Next thing you know the lead time is a month earlier and **just-in-time-production is just a dream.** And you lose a big now-or-never order because you couldn't put a production campaign together fast enough.

# Electronic Label Proofreading

**Thank You**

# Backup Slides

Insert High Detail Chart

# List of Other Process Improvements

Database of **all federal regulatory actions pertaining to labels**. Generate reports of open actions, past actions, by commercial status, by ai, by registration number, by sales, etc.

Database of **all container components**. Generate reports by product, size, component, code, review status, summary of changes, FPL submission, etc.

**Use standards:** file naming convention, "clean vs highlighted" annotation methods, style manual, technical writing

**ALSTAR**